

T. 20679A-09-0274
T. 20680A-09-0274
T. 20681A-09-0274

T. 01846B-09-0274
T. 03289A-09-0274
T. 03198A-09-0274

ARIZONA CORPORATION COMM

UTILITY COMPLAINT FORM



0000107454

Investigator: Trish Meeter

Phone: [REDACTED]

Priority: Respond Within Five Days

Opinion No. 2009 83806

Date: 12/16/2009

Complaint Description: 20Z Telcom Issues - Other
N/A Not Applicable

First:

Last:

Complaint By: Timothy French

Account Name: Timothy French Granite Telecommunications

Home: (000) 000-0000

Street: n/a

Work:

City: n/a

CBR: [REDACTED]

State: AZ Zip: n/a

is: Other

Utility Company: Verizon California, Inc.

Division: Telephone

Contact Name: [REDACTED]

Contact Phone: [REDACTED]

Nature of Complaint:

12/15 DOCKET NO. T-20679A-09-0074

From: Timothy French [mailto:[REDACTED]]
Sent: Monday, December 14, 2009 8:39 AM
To: Utilities Div - Mailbox
Subject: Public Comment - Docket Number T-20679A-09-0274

Attached please find the Public Comment of Granite Telecommunications, LLC regarding Docket Number T-20679A-09-0274.

Please contact me if you have any questions or require any additional information.

Regards,

Tim French
Sr. Assoc. Corp. Counsel
Granite Telecommunications, LLC
Tel: [REDACTED]
Fax: [REDACTED]

Arizona Corporation Commission
DOCKETED

DEC 28 2009

DOCKETED BY	[Signature]
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RE: Verizon - Frontier asset transfer Dear Sir or Madam:

Granite Telecommunications, LLC ("Granite") is a nationwide competitive provider of advanced telecommunications services to enterprise subscribers. Granite is the country's premier provider of nationwide

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ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

local business telecommunications service with almost 900,000 phone lines serving multi-location business customers including 66 of the nation's Fortune 100 companies, as well as various governmental entities including the United States Postal Service.

Many of our customers are national in scope and have locations in almost every region of the country, therefore the impending transfer of service from Verizon Communications to Frontier Corporation raises concerns for our company and ultimately our end user customers. Our customers have grown accustomed to the high quality of service that Granite provides, however as a non-facilities based competitive carrier our customers have raised concerns about the continuity of service during the transition, especially after the pervasive issues that occurred during the Fairpoint and Hawaii divestitures.

We note that we have 293,127 lines located in the states identified by Verizon as containing areas potentially to be transferred to Frontier Corporation yet to date, neither Verizon nor Frontier has identified to Granite specific central offices, lines or customers to be impacted by these changes. They have provided no guidance as to support, billing, contracts or any of the critical information needed to ensure long-term uninterrupted service. Nor has Verizon or Frontier given any assurances that the missteps in prior divestitures have been rectified so that they will not repeat themselves here. In fact, we have been able to obtain almost no information from either company.

While Granite believes that there may be a long-term benefit to moving more rural regions to a company that is focused on providing service in these areas, we also believe that these benefits will only happen if the companies involved work closely with the CLEC community that shares these facilities to ensure that a well managed business and technical process is in place to guarantee a smooth transition of service. We find the lack of communication from these carriers very troubling and ask that your agencies actively support our efforts to have these carriers work with Granite and other competitive local exchange carriers to ensure a well-planned and mutually agreed-upon business and technical process for this transition is in place prior to any final approvals being granted by federal or state agencies.

Respectfully submitted,

GRANITE TELECOMMUNICATIONS, LLC

Samuel J. Kline

Vice President - Strategic Initiatives

End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

Docketed in Verizon Docket No. T-20679A-09-0074

End of Comments

Date Completed: 12/16/2009

Opinion No. 2009 - 83806
